



February 27, 2012

Hon. Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, D.C. 20554

RE: A Request for Quotation for Study Examining the Critical Information Needs of the American Public (BO Docket No. 12-30)

Dear Chairman Genachowski:

The Federal Communications Commission is charged with encouraging the equitable participation of diverse organizations and individuals in the media.<sup>1</sup> Through education and outreach, the Commission has extended its support to existing and new minority owners to help them mitigate the challenges facing new entrants.

Data is required, however, to design narrowly-tailored policies envisioned by the Supreme Court in *Adarand Constructors, Inc. v. Peña*.<sup>2</sup> To date, studies have not adequately captured the true barriers to media ownership and presented strategies for resolving these barriers. We appreciate the Commission's effort to gather the data that are needed to articulate a nexus between minority media ownership and the information needs of the American public.

The Joint Center suggests a longitudinal study that is designed to gather and document the obstacles to media ownership for minorities, especially with respect to their ability to secure access to capital, networks, and expertise. The study would gather direct feedback from existing and potential minority business owners and document their assessment of these barriers. The study would also survey the industry landscape and understand how Equal Employment Opportunity (EEO) practices—particularly employee retention and promotion—impact the ability of minorities to develop the expertise that is necessary to own media outlets.

A study of this sort would enable the Commission to hear directly from constituents and craft policies that both speak to their concerns and withstand strict scrutiny. We sincerely hope the Commission will finally undertake a study to allow policymakers to articulate recommendations that make sense in light of market and socioeconomic realities.

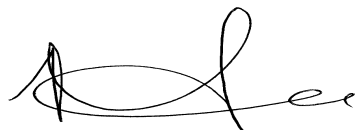
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<sup>1</sup> 47 U.S.C. 257(b) (2012).

<sup>2</sup> *Adarand v. Peña*, 515 U.S. 200, 235 (1995) (“Federal racial classifications, like those of a State, must serve a compelling governmental interest, and must be narrowly tailored to further that interest.”).

Chairman Genachowski  
February 27, 2012

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicol Turner-Lee', with a stylized, flowing script.

Nicol Turner-Lee, Ph.D.  
Vice President & Director,  
Media & Technology Institute

cc: William T. Lake, Chief, Media Bureau, FCC  
Thomas Reed, Director, Office of Communications Business Opportunities, FCC